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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: PROTON-PUMP INHIBITOR
PRODUCTS LIABILITY LITIGATION**

MDL No. 2789

This Document Relates To:

***Freddy Bales v. AstraZeneca
Pharmaceuticals LP***
Case No. 2:17-cv-06124

**CERTIFICATION OF VINCENT LODATO IN SUPPORT OF MOTION
TO EXCLUDE EXPERT TESTIMONY OF GILBERT MOECKEL, M.D., PH.D.**

VINCENT LODATO, pursuant to 28 U.S.C. § 1746, certifies as follows:

1. I am a member of the bar of this Court and of counsel with the law firm of Sills Cummis & Gross, P.C., counsel of record for Defendants Takeda Pharmaceuticals U.S.A., Inc., Takeda Pharmaceuticals America, Inc., Takeda Development Center Americas, Inc. f/k/a Takeda Global Research & Development Center, Inc., Takeda Pharmaceutical Company Limited (collectively “Takeda”) in this multidistrict litigation (“MDL”). I submit this certification in support of Takeda’s Motion to exclude expert testimony of Gilbert Moeckel, M.D., Ph.D. I am fully familiar with the facts set forth herein.

2. Attached hereto as Exhibit A is a true and accurate copy of transcript from the July 7, 2021 deposition of Gilbert Moeckel, M.D., Ph.D.

3. Attached hereto as Exhibit B is a true and accurate copy of the expert report of Gilbert Moeckel, M.D., Ph.D dated May 20, 2021.

4. Attached hereto as Exhibit C is a true and accurate copy of transcript from the July 8, 2021 deposition of Gilbert Moeckel, M.D., Ph.D.

5. Attached hereto as Exhibit D is a true and accurate copy of relevant portions of the transcript from the July 14, 2021 deposition of Wajahat Mehal, Ph.D., M.D.

6. Attached hereto as Exhibit E is a true and accurate copy of an excerpt from Haschek and Rousseaux *Handbook on Toxicological Pathology*.

7. Attached hereto as Exhibit F is a true and accurate copy of relevant portions of the transcript from the June 21, 2021 deposition of Martyn T. Smith, Ph.D.

8. Attached hereto as Exhibit G is a true and accurate copy of relevant portions of the transcript from the September 8, 2021 deposition of John C. Seely, DVM.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

/s/ Vincent Lodato
VINCENT LODATO

Dated: October 15, 2021